

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

21-03147 BKOBJ01
BROCK & SCOTT, PLLC
302 Fellowship Rd, Suite 130
Mount Laurel, NJ 08054
(844) 856-6646
Attorneys for Freedom Mortgage Corporation

In Re:

ROSELYNE ANDREE ST PHARD

Case No: 19-32429-RG

Hearing Date: November 18, 2021

Judge: ROSEMARY
GAMBARDELLA

Chapter: 13

LIMITED OBJECTION TO MOTION TO SELL

COMES NOW, Freedom Mortgage Corporation, (herein, “Creditor”) by and through undersigned counsel, and hereby responds to the Motion to Sell [Doc. 79] filed on November 15, 2021 and in support thereof, shows unto the Court as follows:

1. Creditor objects to any Order permitting sale of the property located at 340 Hamilton Street, Roselle, NJ 07203 (hereinafter “subject property”) without the following:

- a. Creditor’s lien is paid in full from the closing proceeds, pursuant to a proper payoff quote obtained prior to and good through the closing date;
or
- b. Any short payoff is approved by Creditor; and
- c. The sale of the subject property closes within ninety (90) days from entry of the Order authorizing the sale.

WHEREFORE, Creditor respectfully requests that any Order permitting the sale of the subject property condition the same upon the conditions set forth above and for any other relief the Court deems just and proper.

This is the 17th day of November 2021

/s/ Matthew Fissel

Matthew Fissel

(Bar No. 038152012)

Attorney for Creditor

BROCK & SCOTT, PLLC

302 Fellowship Road

Suite 130

Mount Laurel, NJ 08054

Telephone: 844-856-6646 x 4535

Facsimile: 704-369-0760

E-Mail: Matthew.Fissel@brockandscott.com

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CERTIFICATION OF SERVICE

1. I, Cassondra Emanuel:

☐ represent the _____ in the above-captioned matter.

☒ am the secretary/paralegal for BROCK & SCOTT, PLLC, who represents Freedom Mortgage Corporation. in the above captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On November 17, 2021, I sent a copy of the following pleadings and/or documents to the parties listed below:

LIMITED OBJECTION TO MOTION TO SELL

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: November 17, 2021

/s/ Cassondra Emanuel
Cassondra Emanuel

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
ROSELYN ANDREE ST PHARD 340 HAMILTON STREET ROSELLE, NJ 07203	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
RUSSELL L. LOW LOW & LOW 505 MAIN STREET SUITE 304 HACKENSACK, NJ 07601	Debtor's Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Marie-Ann Greenberg Chapter 13 Standing Trustee 30 Two Bridges Rd Suite 330 Fairfield, NJ 07004	Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)

<p>U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102</p>	<p>Trustee</p>	<p><input type="checkbox"/> Hand-delivered</p> <p><input checked="" type="checkbox"/> Regular mail</p> <p><input type="checkbox"/> Certified mail/RR</p> <p><input type="checkbox"/> E-mail</p> <p><input checked="" type="checkbox"/> Notice of Electronic Filing (NEF)</p> <p><input type="checkbox"/> Other _____ (as authorized by the court *)</p>
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* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.